



Massachusetts Department of
Environmental Protection

fact sheet

Regulatory Update: Air Pollution Control Requirements for Adhesives & Sealants

On August 30, 2013, the Massachusetts Department of Environmental Protection (MassDEP) promulgated Adhesives and Sealants regulations, 310 CMR 7.18(30), which establish volatile organic compound (VOC) limits for industrial and commercial adhesives, sealants, adhesive primers, sealant primers, and associated surface preparation and cleanup solvents. These materials typically contain VOCs, which evaporate during application and contribute to air pollution, including the formation of ground-level ozone (i.e., smog). Many VOCs also are toxic and can adversely affect public health. The regulations also establish requirements for application techniques, container labeling, work practices, and recordkeeping. A copy of the Adhesives and Sealants regulations is available at: <http://www.mass.gov/eea/docs/dep/service/regulations/310cmr07.pdf> or <http://www.mass.gov/eea/agencies/massdep/air/regulations/310-cmr-7-00-air-pollution-control-regulation.html>.

Applicability & Compliance Dates

The regulations' applicability and compliance dates are as follows:

- The regulations apply to any person who manufactures, distributes, or sells for use in Massachusetts adhesives, adhesive primers, sealants, and sealant primers, and to any person who applies these materials in Massachusetts except homeowners/residents who use these products at a private residence for personal use and not for compensation.
- The VOC content limits take effect on January 1, 2015 for manufacturers, on September 1, 2015 for sellers, suppliers, and distributors, and on May 1, 2016 for users of regulated products. No noncompliant products may be manufactured, sold, supplied, distributed, or used after the applicable compliance dates.
- Facilities may use a regulated product that does not meet the applicable VOC content limit only in conjunction with air pollution control equipment that is approved by MassDEP, and achieves at least 85 percent reduction of uncontrolled emissions.

The regulations do not apply to products:

- intended for shipment and use outside of Massachusetts;
- regulated under 310 CMR 7.25(12), Consumer Products;
- that contain less than 20 grams of VOC per liter of adhesive or sealant, less water and exempt compounds, as applied;
- used in small quantities -- i.e., when (a) the total facility-wide VOC emissions of adhesives, sealants, adhesive primers, and sealant primers are less than 200 lbs/year, or (b) total usage of these materials, including surface preparation and clean-up solvents, is less than 55 gallons/year; and
- specifically exempted (e.g., products used in manufacture of medical equipment or R&D).

Labeling, Recordkeeping & Permitting Requirements for Manufacturers

Container Labeling

Manufacturers of adhesives, sealants, adhesive primers, and sealant primers must provide certain product information on the container or on the label affixed to the container.

Recordkeeping

Manufacturers must maintain, for three years, all records related to:

- product name, product category, VOC content as supplied, and type of product application;
- volume of each product sold in Massachusetts in containers with net volume greater than 16 fluid ounces;
- exempted non-compliant products that are for use outside Massachusetts;
- non-compliant products that are being tested in quality assurance, research and development, or an analytical testing laboratory;
- compliance testing for VOC content.

Labeling Requirements

- Thinning recommendations unless water is used as the reducing agent.
- Maximum or actual VOC content of the product as supplied in grams of VOC per liter of product.
- Maximum or actual VOC content of the product as applied, including the manufacturer's maximum recommendation for thinning in grams of VOC per liter of product.

Please refer to the regulations for recordkeeping requirements for distributors, sellers and users.

Permitting Requirements

The regulations do not establish any new permitting requirements. However, businesses that manufacture or apply adhesives and sealants in Massachusetts may be required to obtain a permit from MassDEP depending on potential VOC emissions. If you have any questions about air permitting, please contact your MassDEP Regional Office Air Permit Section at www.mass.gov/eea/agencies/massdep/about/contacts/find-the-massdep-regional-office-for-your-city-or-town.html.

Table of Standards
VOC Content Limits for adhesives, sealants, adhesive primers, and sealant primers*

Product or Substrate Category	VOC (g/l)	Product or Substrate Category	VOC (g/l)	Product or Substrate Category	VOC (g/l)
Adhesives					
ABS Welding	400	Metal to Urethane/Rubber Molding Or Casting	850	Single-ply Roof Membrane Installation/Repair	250
Ceramic Tile Installation	130	Multipurpose Construction	200	Sheet Rubber Lining Installation	850
Computer Diskette Jacket Manufacturing	850	Non-membrane Roof Installation/Repair	300	Structural Glazing	100
Contact	250	Outdoor Floor Covering Installation	250	Thin Metal Laminating	780
Cove Base Installation	150	Perimeter Bonded Sheet Vinyl Flooring Installation	660	Tire Retread	100
CPVC Welding	490	Plastic Cement Welding (Non ABS)	500	Waterproof Resorcinol Glue	170
Indoor Floor Covering Installation	150	PVC Welding	510		
Sealants					
Architectural	250	Non-membrane Roof Installation/Repair	300	Single-ply Roof Membrane	450
Marine Deck	760	Roadway	250	Other	420
Adhesive Primers					
Automotive Glass	700	Single-ply Roof Membrane	250	Other	250
Plastic Cement Welding	650	Traffic Marking Tape	150		
Sealant Primers					
Non-porous Architectural	250	Marine Deck	760		
Porous Architectural	775	Other	750		
Adhesives Applied to Particular Substrates					
Flexible Vinyl	250	Porous Material	120	Wood	30
Fiberglass	200	Reinforced Plastic Composite	200	Other Substrates	250
Metal	30	Rubber	250		

* The VOC content is determined as the weight of volatile compounds, less water and exempt compounds, as specified in 310 CMR 7.18(30)(f) (Compliance Procedures and Test Methods).

This fact sheet is intended for general reference only and does not represent a full and complete statement of the technical or legal requirements associated with the regulation.

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